

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE: § § CASE NO. 24-33165
TAMEIA M. FRANK § §
DEBTOR § § CHAPTER 7

**MOTION FOR WITHDRAWAL AND
SUBSTITUTION OF COUNSEL FOR DEBTOR**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Debtor(s)' Counsel, Amy Bates Ames, moves for withdrawal as counsel of record for the above-referenced Debtor and for substitution of the counsel, Stuart M. Price and Alan D. Borden, at the Resolve Law Group, and respectfully states as follows:

This motion seeks an order that may adversely affect you. If you oppose the motion, you should immediately contact the moving party to resolve the dispute. If you and the moving party cannot agree, you must file a response and send a copy to the moving party. You must file and serve your response within 21 days of the date this was served on you. Your response must state why the motion should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the motion and have not reached an agreement, you must attend the hearing. Unless the parties agree otherwise, the court may consider evidence at the hearing and may decide the motion at the hearing.

Represented parties should act through their attorney.

**There will be a hearing on this motion on September 25, 2024, at 1:30 p.m. CT
in Houston Courtroom #403, 515 Rusk Avenue, Houston, TX 77002.**

1. This Motion is filed in accordance with Rule 2014 of the Federal Rules of Bankruptcy Procedure, Local Rule 2014-1(a) of the U.S. Bankruptcy Court for the Southern District of Texas.

2. Amy Bates Ames requests to withdraw as counsel for the Debtor(s), as she is resigning as an attorney at the Resolve Law Group.

3. Ms. Ames has conferred with Debtor, and the Debtor has consented to the substitution of counsel by the following attorney(s) within the same law firm, the Resolve Law Group, a registered d/b/a of The Price Law Group, A.P.C., who is admitted to practice before this Court:

Stuart M. Price
Alan D. Borden
Resolve Law Group
801 Travis Street, Suite 2101
Houston, TX 77002
platinum@resolvelawgroup.com

4. Pursuant to Local Rule 2014-1(a), an Amended Disclosure of Compensation of Attorney for Debtor required by Rule 2016(b) of the Federal Rules of Bankruptcy Procedure and Section 329 of the United States Bankruptcy Code contemporaneously is being filed with this Motion. See attached Exhibit 1 which is incorporated by reference as if set forth fully herein.

5. Please direct all future notices, correspondence, and pleadings in this case to Stuart M. Price, Attorney at the Resolve Law Group.

6. The Resolve Law Group will represent the Debtor(s) at the creditors' meeting scheduled on August 27, 2024, at 9:30 a.m. CT, in the above-referenced case.

WHEREFORE, PREMISES CONSIDERED, the undersigned Debtor(s)' counsel requests this Court grant the relief requested herein and for any other and further relief as is just and proper.

APPROVED BY:



Tameia M. Frank, Debtor

Respectfully submitted,
RESOLVE LAW GROUP,
A registered d/b/a of The Price Law Group, A.P.C.

/s/ Amy Bates Ames

Stuart M. Price
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Amy Bates Ames
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ATTORNEY FOR DEBTOR(S)

CERTIFICATE OF SERVICE

I hereby certify that on or before August 14, 2024, a true and correct copy of the above-referenced Motion was electronically noticed and/or mailed via first class mail, postage prepaid to the Debtor(s), the Chapter 13 Trustee, the U.S. Trustee, and all attorneys and parties-in-interest who have requested notices.

/s/ Amy Bates Ames
Amy Bates Ames

**IN THE UNITED STATES BANKRUPTCY COURT
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IN RE: § **CASE NO. 24-33165**
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**ORDER GRANTING MOTION FOR WITHDRAWAL
AND SUBSTITUTION OF COUNSEL**

On this Date, the Court considered the Motion for Withdrawal and Substitution of Counsel filed on August 13, 2024, in the above-referenced case (the “Motion”).

The Court finds that proper notice has been given to all parties in interest and good cause exists to grant the Motion. The Court further finds that Debtor's counsel has purported that Debtor consented to relief requested in this Motion, and no hearing is necessary or required.

IT IS THEREFORE ORDERED as follows:

1. The Motion hereby is granted.
2. The request by Amy Bates Ames (TX Bar No. 24025243 | TXSB Federal No. 30427) to withdraw as counsel of record is effective upon entry of this Order, and Ms. Ames will have no further responsibility in this matter.
3. Stuart M. Price (CA Bar No. 150439 | SDTX Federal No. 3821835), Alan D. Borden (FL Bar No. 58250 | TXSB Fed. ID No. 3887551), and the law firm of the Resolve Law Group, a registered d/b/a of The Price Law Group, A.P.C., 801 Travis Street, Suite 2101, Houston, TX 77002, hereby is substituted as counsel for Debtor.